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8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 ***

12 VICTOR PEREZ, as Special Administrator of
the Estate of CARLOS PEREZ, deceased;
13 VICTOR PEREZ, as the Guardian Ad Litem
for S.E.P, a minor; VICTOR PEREZ, as the
Guardian Ad Litem for A.I.P., a minor;

14 Plaintiff,

15 vs.

16 STATE OF NEVADA, ex. rel. NEVADA
17 DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
18 WARDEN DWIGHT NEVEN, individually;
ASSISTANT WARDER TIMOTHY FILSON,
19 individually; COT RAMOS, individually;
LIEUTENANT OLIVER, individually;
20 CORRECTIONS OFFICER CASTRO,
individually; CORRECTIONS OFFICER
21 SMITH, individually; and DOES I-X,
inclusive; and ROES I-X, inclusive;
22

23 Defendants.

CASE NO. 2:15-cv-1572-APG-DJA

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR THE
DEFENDANTS TO FILE THEIR
REPLIES IN SUPPORT OF MOTIONS
FOR SUMMARY JUDGMENT (Dkts. 146,
147, 153 and 159)**

FIRST REQUEST

24 Pursuant to IA 6-1 and LR 26-3, Plaintiff, Victor Perez, as Special Administrator of the
25 Estate of Carlos Perez, deceased; Victor Perez, as Guardian Ad Litem for S.E.P., a minor; Victor
26 Perez, as Guardian Ad Litem for A.I.P., a minor, Defendants State of Nevada ex. rel. Nevada
27 Department of Corrections, Director Greg Cox, Warden Dwight Neven, Assistant Warden
28 Timothy Filson, COT Ramos, Lieutenant Oliver, Corrections Officer Castro, and Corrections

1 Officer Smith, by and through their respective counsel of record, hereby stipulate to extend the
2 deadline to file their Replies in Support of Motions for Summary Judgment in the above-captioned
3 case by fourteen (14) days, up to and including February 18, 2022.

4 **The motions governed by this Stipulation and Proposed Order are as follows:**

5 Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146],

6 Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147],

7 State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy

8 Filson, Dwight Neven and Ronald Olivers' Motion for Summary Judgment [Dkt 153]

9 Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159]

10 Counsel for the plaintiffs have no objection to extending the deadlines for defendants to
11 file replies.

12 Over the past weeks counsel for Defendant Ramos has been occupied in preparing for trials
13 in: *Latham v. City of Henderson* – A-19-790017-C, *Barrese v. LVMPD, et al.* – 2:18-cv-
14 1671-KJD-EJY, *Crystal Choi v. SFMAIC, et al.* -A-20-819428-C, *James Jackson v.*
15 *USAA* – A-19-800593-C, Counsel has also been preparing a Motion for Summary Judgment in
16 *Gregory v. City of North Las Vegas, et al.* – 2:20-cv-1439-APG.

17 This request for extension is made in good faith and not for the purposes of delay.

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WHEREFORE, the parties respectfully request that this Court extend the time for the parties to file their Replies in Support of Motions for Summary Judgment by fourteen (14) days from the current deadline of February 4, 2022 up to and including February 18, 2022.

DATED this 31st day of January, 2022.

DATED this 31st day of January, 2022.

LEWIS BRISBOIS BISGAARD & SMITH

CLARK HILL PLLC

/s/ Robert W. Freeman

/s / Paola M. Armeni

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Raynaldo-John Ramos

DATED this 31st day of January, 2022.

DATED this 31st day of January, 2022.

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/s / Alina M. Shell

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State of Nevada, ex. rel. Nevada Department

of Corrections, Director James Greg Cox,

Warden, Dwight Neven, Assistant Warden

Timothy Filson, and Lieutenant Ronald

Oliver

1 DATED this 31st day of January, 2022.

2 MARQUIS AURBACH & COFFING

3
4 /s / Craig R. Anderson

5 CRAIG R. ANDERSON

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Attorneys for Defendant

Corrections Officer Castro

10 **ORDER**

11 IT IS SO ORDERED.

12 Dated this 1st day of February, 2022.

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16 U.S. DISTRICT COURT JUDGE
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